

From: seby@gtlaw.com
To: mdigiglia@glllaw.com; [Quinones, Edwin](mailto:Quinones.Edwin@epa.gov)
Cc: bdoherly@glllaw.com; egieger@glllaw.com
Subject: RE: POTW Position Paper- USOR Site
Date: Tuesday, December 12, 2017 12:06:11 PM

Ed- Mike filled me in on your call.

We look forward to meeting with EPA after we have received your and the agency's feedback on the POTW paper provided to you on Dec. 5th. Please let us know when you are prepared to discuss those issues and we can set up a call regarding same.

Thanks

Paul M. Seby

Shareholder

Greenberg Traurig, LLP | 1200 17th Street, Suite 2400 | Denver, Colorado 80202

Tel 303.572.6584

From: Mike DiGiglia [<mailto:mdigiglia@glllaw.com>]
Sent: Tuesday, December 12, 2017 10:10 AM
To: Seby, Paul (Shld-DEN-Env); quinones.edwin@epa.gov
Cc: Brendan Doherty; Ernie Gieger
Subject: RE: POTW Position Paper- USOR Site

Paul,

The call was entered on our calendars for 10 CT so Ernie and I dialed in at 10 am CT and Ed also dialed in at 10 CT. Our mistake.

Ed updated us on the purpose for the walkthrough, our information request and he will send us some possible dates for a meeting in January.

I can give you an update if you give me a call.

Thanks,

Mike

From: seby@gtlaw.com [<mailto:seby@gtlaw.com>]
Sent: Tuesday, December 12, 2017 11:07 AM
To: quinones.edwin@epa.gov; Mike DiGiglia <mdigiglia@glllaw.com>
Cc: Brendan Doherty <bdoherly@glllaw.com>; Ernie Gieger <egieger@glllaw.com>
Subject: RE: POTW Position Paper- USOR Site

Gents- I dialed in at 10am mtn/ 11am central per our emails below setting the call up.

Please let me know if you'd like to reschedule.

Paul

Paul M. Seby

Shareholder

Greenberg Traurig, LLP | 1200 17th Street, Suite 2400 | Denver, Colorado 80202

Tel 303.572.6584

From: Quinones, Edwin [<mailto:quinones.edwin@epa.gov>]
Sent: Monday, December 11, 2017 11:06 AM
To: Mike DiGiglia; Seby, Paul (Shld-DEN-Env)
Cc: Brendan Doherty; Ernie Gieger
Subject: RE: POTW Position Paper- USOR Site

Sounds good. Thanks for setting up the conference line, Mike.

Ed Q.

From: Mike DiGiglia [<mailto:mdigiglia@glllaw.com>]

Sent: Monday, December 11, 2017 11:51 AM

To: Quinones, Edwin <quinones.edwin@epa.gov>; sebyp@gtlaw.com

Cc: Brendan Doherty <bdoherty@glllaw.com>; Ernie Gieger <egieger@glllaw.com>

Subject: RE: POTW Position Paper- USOR Site

Ed and Paul,

We can use my conference call info:

Dial in: 877-633-3112

Passcode: 5046541347

Thanks,

Mike

From: Mike DiGiglia

Sent: Monday, December 11, 2017 11:47 AM

To: 'Quinones, Edwin' <quinones.edwin@epa.gov>; sebyp@gtlaw.com

Cc: Brendan Doherty <bdoherty@glllaw.com>; Ernie Gieger <egieger@glllaw.com>

Subject: RE: POTW Position Paper- USOR Site

Ed,

That works for us. Still waiting to hear from Paul.

Thanks,

Mike

From: Quinones, Edwin [<mailto:quinones.edwin@epa.gov>]

Sent: Monday, December 11, 2017 9:28 AM

To: sebyp@gtlaw.com

Cc: Mike DiGiglia <mdigiglia@glllaw.com>; Brendan Doherty <bdoherty@glllaw.com>

Subject: RE: POTW Position Paper- USOR Site

Hi Paul,

Would tomorrow (Tuesday, Dec. 12) at 11 am Central (10 am Mountain) work for you and Mike?

Ed

From: sebyp@gtlaw.com [<mailto:sebyp@gtlaw.com>]

Sent: Friday, December 08, 2017 10:40 AM

To: Quinones, Edwin <quinones.edwin@epa.gov>

Cc: mdigiglia@glllaw.com; bdoherty@glllaw.com

Subject: Re: POTW Position Paper- USOR Site

Ed , thanks for acknowledging the call and we appreciate EPA's attention to the position paper and look forward to discussing soon. We would still like to speak with you on other matters on Tuesday , if doing so some time works for you .

Please let us know

Thanks

On Dec 8, 2017, at 8:28 AM, Quinones, Edwin <quinones.edwin@epa.gov> wrote:

Hi Paul,

Sorry I missed your call yesterday. I got your voice-mail message asking for a

conference call next week to discuss the points you've made in your position paper. Although I've done my own research on the issue, I have not yet had a chance to discuss the matter with HQ and Department of Justice attorneys. I'd like the opportunity to do so before we can have a meaningful discussion. I'm hoping to be able to do so by the end of next week at the earliest or the week after (week of December 18).

Also, I appreciate you letting me know the week of December 18 will not work for a meeting with the EPA and the PRP Group. However, would a technical representative from the City and Severn Trent be available to meet the EPA On-Scene Coordinator, Adam Adams, and the PRP Group's Project Coordinator for a site walk on Wednesday, December 20, of the former wastewater treatment plant? Having them available would be invaluable given their much greater familiarity of the property. The site walk would be with technical representatives only. Neither I nor any of the PRP attorneys will be at the site walk. Please let me know if a representative from one or both would be available for this.

Thanks,
Ed Q.

From: sebyp@gtlaw.com [<mailto:sebyp@gtlaw.com>]

Sent: Tuesday, December 05, 2017 11:50 AM

To: Quinones, Edwin <quinones.edwin@epa.gov>

Cc: mdigiglia@glllaw.com; bdoherty@glllaw.com

Subject: POTW Position Paper- USOR Site

Greetings Ed-

Following up on our conversation, attached is the position paper we discussed.

The City of Pasadena and Severn Trent Environmental Services would appreciate EPA's prompt review and consideration of these issues. After you have had an opportunity to review and consider the attached, please let us know if we can arrange a time to visit-on both the paper and the points in your email yesterday.

Thanks

Paul M. Seby

Shareholder

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